

IN THE DISTRICT COURT OF THE UNITED STATES
for the Western District of New York

MAY 2016 GRAND JURY
(Impaneled 05/13/2016)

THE UNITED STATES OF AMERICA

-vs-

JOSEPH KUROWSKI

INDICTMENT

Violations:

Title 18, United States Code,
Sections 2251(a), 2251(e),
2252A(a)(2)(A), 2252A(a)(5)(B), and
2422(b)

(4 Counts and Forfeiture Allegation)

COUNT 1
(Attempted Enticement of a Minor)

The Grand Jury Charges That:

Between on or about June 19, 2015, and on or about June 23, 2015, in the Western District of New York, and elsewhere, the defendant, JOSEPH KUROWSKI, using a facility and means of interstate and foreign commerce, that is, a cellular telephone and the internet, did knowingly attempt to persuade, induce, entice, and coerce, Victim 1, a person known to the Grand Jury, an individual who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense.

All in violation of Title 18, United States Code, Section 2422(b).

COUNT 2
(Production of Child Pornography)

The Grand Jury Further Charges That:

Between on or about March 18, 2015, and on or about April 10, 2015, in the Western District of New York, and elsewhere, the defendant, JOSEPH KUROWSKI, did knowingly employ, use, persuade, induce, entice, and coerce, and attempt to employ, use, persuade, induce, entice, and coerce, a minor, that is, Victim 2, a person known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing, and having reason to know, that the visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce; which visual depiction was produced, and would be produced, using materials that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer; and which visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce.

All in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT 3
(Receipt of Child Pornography)

The Grand Jury Further Charges That:

On or about April 10, 2015, in the Western District of New York, and elsewhere, the defendant, JOSEPH KUROWSKI, did knowingly receive child pornography, as defined in Title 18, United States Code, Section 2256(8), that is, an image of Victim 2, a person known to the Grand Jury, that had been shipped and transported using any means and facility of

interstate and foreign commerce, and that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Section 2252A(a)(2)(A).

COUNT 4
(Possession of Child Pornography)

The Grand Jury Further Charges That:

Between on or about April 10, 2015, and on or about October 21, 2015, in the Western District of New York, the defendant, JOSEPH KUROWSKI, did knowingly possess material, that is, an Apple Macbook laptop computer, that contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been shipped and transported using any means and facility of interstate and foreign commerce; that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer; and that had been produced using materials that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

FORFEITURE ALLEGATION

The Grand Jury Alleges That:

As a result of the offenses alleged in this Indictment, the defendant, JOSEPH KUROWSKI, shall forfeit to the United States any matter which contains any such visual depiction of child pornography, which was produced, transported, mailed, shipped, or received and/or any and all property, real and personal, used or intended to be used to

commit or to promote the commission of such offense, and all property traceable to such property, including but not limited to the following:

- 1) One (1) Apple Macbook Pro, bearing serial no: C02NJ1DTG3QC;
- 2) One (1) Apple iPhone cellular phone, Model: A1522, IMEI: 354386067144522;
and
- 3) One (1) black Apple iPad tablet, Model: 1566, bearing serial no:
DMPND5DVG5VW.

All pursuant to Title 18, United States Code, Sections 2253(a)(1) and 2253(a)(3).

DATED: Buffalo, New York, August 3, 2016.

WILLIAM J. HOCHUL, JR.
United States Attorney

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A TRUE BILL:

S/FOREPERSON